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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,980.00 IN  
U.S. CURRENCY,

15 APPROXIMATELY \$15,000.00 IN  
U.S. CURRENCY, AND

16 APPROXIMATELY \$4,335.00 IN  
U.S. CURRENCY,

17 Defendant.

2:21-MC-00213-MCE-CKD

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19 STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jason  
21 Brewer (“claimant”), by and through their respective counsel, as follows:

22 1. On or about June 4, 2021, claimant filed a claim in the administrative forfeiture proceeding  
23 with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately \$19,980.00  
24 in U.S. Currency, Approximately \$15,000.00 in U.S. Currency and Approximately \$4,335.00 in U.S.  
25 Currency (hereafter “defendant currency”), which were seized on March 17, 2021.

26 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
27 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
28 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim

1 to the defendant currency as required by law in the administrative forfeiture proceeding.

2       3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
3 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
4 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
5 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
6 That deadline was September 2, 2021.

7       4. By Stipulation and Order filed September 1, 2021, the parties stipulated to extend to October  
8 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11       5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
12 November 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
14 to forfeiture.

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1       6. Accordingly, the parties agree that the deadline by which the United States shall be required  
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
3 the defendant currency is subject to forfeiture shall be extended to November 1, 2021.

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5 Dated: 10/1/21

PHILLIP A. TALBERT  
Acting United States Attorney

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7 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
8 Assistant United States Attorney

9 Dated: 10/1/21

10 /s/ Valery Nechay  
VALERY NECHAY  
11 Attorney for potential claimant  
Jason Brewer  
(Signature authorized by phone)

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14 IT IS SO ORDERED.

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16 Dated: October 6, 2021

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18 MORRISON C. ENGLAND, JR.  
19 SENIOR UNITED STATES DISTRICT JUDGE